

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

CLARA E. ELLIOTT

PLAINTIFF

VS.

CIVIL ACTION NO. 1:14-cv-20-LG-JMR

HUNTINGTON INGALLS INCORPORATED

DEFENDANT

**HUNTINGTON INGALLS INCORPORATED'S
MOTION FOR SUMMARY JUDGMENT**

Defendant Huntington Ingalls Incorporated files this Motion for Summary Judgment on the grounds explained in its Memorandum in Support of Motion for Summary Judgment. Defendant also relies on the following exhibits:

- Exhibit 1. Excerpts from Deposition of Clara Elliott
- Exhibit 2. January 9, 2013 Medical Record
- Exhibit 3. May 25, 2013 Social Security Benefits Questionnaire
- Exhibit 4. May 28, 2013 Social Security Benefits Questionnaire
- Exhibit 5. Application Summary for Disability Insurance Benefits
- Exhibit 6. May 28, 2013 Social Security Benefits Work History Report
- Exhibit 7. August 16, 2013 Social Security Benefits Request for Corrective Action
- Exhibit 8. Declaration of Lawrence Chambliss
- Exhibit 9. July 14, 2005 Ingalls Work Restriction Program
- Exhibit 10. August 3, 2005 Certification of Health Provider
- Exhibit 11. July 1, 2010 Letter from Cardiology Associates
- Exhibit 12. Declaration of Cecil McCray
- Exhibit 13. Medical Records received by HII on August 30, 2010
- Exhibit 14. February 7, 2011 Charge of Discrimination

- Exhibit 15. June 9, 2011 Letter from Cardiology Associates
- Exhibit 16. Declaration of Michelle Edwards
- Exhibit 17. June 24, 2011 Charge of Discrimination
- Exhibit 18. September 6, 2011 Medical Documentation
- Exhibit 19. September 9, 2011 Medical Documentation
- Exhibit 20. January 25, 2012 Certificate to Return to Work
- Exhibit 21. February 7, 2012 to March 27, 2012 Cumulative Medical Documentation
- Exhibit 22. April 25, 2012 Letter from Cardiology Associates
- Exhibit 23. May 17, 2012 Medical Documentation
- Exhibit 24. June 20, 2012 Medical Record
- Exhibit 25. August 22, 2012 Certificate to Return to Work
- Exhibit 26. December 10, 2012 Charge of Discrimination
- Exhibit 27. Reasonable Accommodation Policy

Dated: August 1, 2014.

Respectfully submitted,

HUNTINGTON INGALLS INCORPORATED

By Its Attorneys,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

s/ Brooks Eason
BROOKS EASON

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system which sent notification of such filing to counsel of record.

Dated: August 1, 2014.

s/ Brooks Eason
Of Counsel